## **U.S. District Court** District of Columbia (Washington, DC) CIVIL DOCKET FOR CASE #: 1:25-cv-00400-AHA

AIDS VACCINE ADVOCACY COALITION et al v. UNITED

STATES DEPARTMENT OF STATE et al

Assigned to: Judge Amir H. Ali

Related Case: 1:25-cv-00402-AHA

Cause: 05:551 Administrative Procedure Act

**Plaintiff** 

AIDS VACCINE ADVOCACY

**COALITION** 

Date Filed: 02/10/2025 Jury Demand: None

Nature of Suit: 360 P.I.: Other

Jurisdiction: U.S. Government Defendant

represented by Allison Marcy Zieve

PUBLIC CITIZEN LITIGATION GROUP

1600 20th Street, NW Washington, DC 20009  $(202)\ 588-1000$ Fax: (202) 588-7795 Email: azieve@citizen.org ATTORNEY TO BE NOTICED

Nicolas Sansone

PUBLIC CITIZEN 1600 20th Street NW Washington, DC 20009

202-588-1000

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**Lauren Bateman** 

**PUBLIC CITIZEN** Litigation Group 1600 20th St NW Washington, DC 20009

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**Plaintiff** 

JOURNALISM DEVELOPMENT NETWORK, INC.

represented by Allison Marcy Zieve

(See above for address)

ATTORNEY TO BE NOTICED

**Nicolas Sansone** 

(See above for address)

ATTORNEY TO BE NOTICED

**Lauren Bateman** 

(See above for address)

ATTORNEY TO BE NOTICED

V.

**Defendant** 

UNITED STATES DEPARTMENT OF **STATE** 

represented by Indraneel Sur

U.S. DEPARTMENT OF JUSTICE

1100 L St. NW

Washington, DC 20530

202-616-8488

Email: Indraneel.Sur@usdoi.gov

LEAD ATTORNEY

#### ATTORNEY TO BE NOTICED

Christopher D. Edelman

U.S. DEPARTMENT OF JUSTICE

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ATTORNEY TO BE NOTICED

#### **Defendant**

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

represented by Indraneel Sur

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

ATTORNEY TO BE NOTICED

Christopher D. Edelman (See above for address) ATTORNEY TO BE NOTICED

#### **Defendant**

MARCO RUBIO

Secretary of State, and Acting Administrator of United States Agency for International Development represented by Indraneel Sur

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Christopher D. Edelman (See above for address) ATTORNEY TO BE NOTICED

**Defendant** 

OFFICE OF MANAGEMENT & BUDGET

represented by Indraneel Sur

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Christopher D. Edelman (See above for address) ATTORNEY TO BE NOTICED

**Defendant** 

RUSSELL VOUGHT

Director, Office of Management and Budget

represented by Indraneel Sur

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Christopher D. Edelman (See above for address) ATTORNEY TO BE NOTICED

**Defendant** 

DONALD TRUMP

President of the United States of America

represented by Indraneel Sur

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Christopher D. Edelman (See above for address) ATTORNEY TO BE NOTICED

**Amicus** 

# CONSTITUTIONAL ACCOUNTABILITY CENTER

represented by

Brianne Jenna Gorod

CONSTITUTIONAL

ACCOUNTABILITY CENTER

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Date Filed	#	Docket Text
02/10/2025	1	COMPLAINT for Declaratory and Injunctive Relief against All Defendants (Filing fee \$ 405 receipt number ADCDC-11470533) filed by JOURNALISM DEVELOPMENT NETWORK, INC., AIDS VACCINE ADVOCACY COALITION. (Attachments: # 1 Civil Cover Sheet, # 2 Summons to Department of State, # 3 Summons to OMB, # 4 Summons to Marco Rubio, # 5 Summons to Donald Trump, # 6 Summons to USAID, # 7 Summons to Russell Vought, # 8 Summons U.S. Attorney's Office, # 9 Summons to Attorney General, # 10 Exhibit State Dep't Memorandum, # 11 Exhibit Declaration of Mitchell Warren, # 12 Exhibit Declaration of Andrew Sullivan)(Bateman, Lauren) (Attachment 1 replaced on 2/11/2025) (znmw). (Entered: 02/10/2025)
02/10/2025	2	NOTICE of Appearance by Nicolas Sansone on behalf of All Plaintiffs (Sansone, Nicolas) (Entered: 02/10/2025)
02/10/2025	<u>3</u>	NOTICE of Appearance by Allison Marcy Zieve on behalf of All Plaintiffs (Zieve, Allison) (Entered: 02/10/2025)
02/10/2025	<u>4</u>	NOTICE OF RELATED CASE by All Plaintiffs. Case related to Case No. 25–239, 25–352. (Zieve, Allison) (Entered: 02/10/2025)
02/10/2025	<u>5</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by AIDS VACCINE ADVOCACY COALITION (Zieve, Allison) (Entered: 02/10/2025)
02/10/2025	<u>6</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by JOURNALISM DEVELOPMENT NETWORK, INC. (Zieve, Allison) (Entered: 02/10/2025)
02/11/2025		Case Assigned to Judge Loren L. AliKhan. (znmw) (Entered: 02/11/2025)
02/11/2025	7	SUMMONS (8) Issued Electronically as to All Defendants, U.S. Attorney and U.S. Attorney General (Attachments: # 1 Notice and Consent)(znmw) (Entered: 02/11/2025)
02/11/2025		MINUTE ORDER: Plaintiffs are hereby ORDERED to show cause on or before February 11, 2025 at 2:00 p.m. as to why this case should not be randomly assigned. It is not obvious that the instant case, which brings claims related to Executive Order 14169, 90 Fed. Reg. 8619, is related to the Office of Management and Budget memorandum that is at issue in <i>National Council of Nonprofits, et al. v. Office of Management and Budget, et al.</i> , No. 25–CV–239. Under Local Civil Rule 40.5(a)(3), cases are properly deemed related when they "(i) relate to common property, or (ii) involve common issues of fact, or (iii) grow out of the same event or transaction or (iv) involve the validity or infringement of the same patent." Given that "the mere presence

		of overlapping parties is not among the bases for a related–case designation," <i>Klayman v. Porter</i> , No. 20–CV–3109, 2021 WL 1668067, at *2 (D.D.C. Apr. 28, 2021) (internal quotation marks and citation omitted), Plaintiffs are ordered to show cause as to why this case fits into the "narrow exception," codified in Local Rule 40.5, to the "foundational principle of random assignment only when the relationship between the [related] cases is certain," <i>Klayman</i> , 2021 WL 1668067 at *1. Signed by Judge Loren L. AliKhan on 02/11/2025. (Iclla1) (Entered: 02/11/2025)
02/11/2025	<u>8</u>	NOTICE OF RELATED CASE by All Defendants. Case related to Case No. 1:25-cv-352. (Edelman, Christopher) (Entered: 02/11/2025)
02/11/2025	9	RESPONSE TO ORDER TO SHOW CAUSE re Order to Show Cause,,,,, filed by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Sansone, Nicolas) (Entered: 02/11/2025)
02/11/2025		NOTICE OF ERROR regarding 2 Response to Order to Show Cause. Please note the following: Invalid attorney signature–signature on document must match PACER login. Do not refile; future non–compliant documents will be entered in error. (znmw) (Entered: 02/11/2025)
02/11/2025		MINUTE ORDER: Upon consideration of Plaintiffs' response 2 to the show–cause order, it is hereby ORDERED that Defendants shall file a response to the show–cause order on or before February 11, 2025 at 5:00 p.m. Signed by Judge Loren L. AliKhan on 02/11/2025. (Iclla1) (Entered: 02/11/2025)
02/11/2025	<u>10</u>	RESPONSE TO ORDER TO SHOW CAUSE re Order, filed by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. (Edelman, Christopher) (Entered: 02/11/2025)
02/11/2025	<u>11</u>	ERRATA re 1 Complaint by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Bateman, Lauren) Modified on 2/12/2025 to add link (mg). (Entered: 02/11/2025)
02/11/2025	<u>12</u>	ORDER directing the Clerk of Court to TRANSFER this matter to the Calendar and Case Management Committee. See order for details. Signed by Judge Loren L. AliKhan on 02/11/2025. (lclla1) (Entered: 02/11/2025)
02/11/2025		Case randomly reassigned to Judge Amir H. Ali pursuant to <u>12</u> Order dated 2/11/2025. Judge Loren L. AliKhan is no longer assigned to the case. (ztnr) (Entered: 02/12/2025)
02/12/2025		MINUTE ORDER. The Court will hold a telephonic motion hearing in No. 25–cv–00400 and No. 25–cv–00402 on February 12, 2025, at 1:30 p.m. The information for the public access line is as follows: the toll–free number is 833–990–9400, and the Meeting ID is 771021014. Signed by Judge Amir H. Ali on 2/12/2025. (lcaha2) Modified on 2/12/2025. (zalh) (Entered: 02/12/2025)
02/12/2025	<u>13</u>	MOTION for Temporary Restraining Order by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Attachments: # 1 Memorandum in Support, # 2 Declaration Declaration of Mitchell Warren, # 3 Exhibit Exhibit A to Warren Declaration, # 4 Declaration Declaration of Andrew Sullivan, # 5 Exhibit Exhibit A to Sullivan Declaration, # 6 Text of Proposed Order)(Sansone, Nicolas) (Entered: 02/12/2025)
02/12/2025	<u>14</u>	NOTICE OF RELATED CASE by All Defendants. Case related to Case No. 1:25cv352. (Edelman, Christopher) (Entered: 02/12/2025)
02/12/2025		Minute Entry for telephonic proceeding held before Judge Amir H. Ali: Motion Hearing held on 2/12/2025 re 13 Plaintiff's Motion for a Temporary Restraining Order. Oral arguments heard. The Court takes the motion under advisement. A written order is forthcoming via Chambers. The Court orders the parties to submit a proposed order by 4:30 PM today. (Court Reporter: William Zaremba) (zalh) (Entered: 02/12/2025)
02/12/2025	<u>15</u>	NOTICE <i>Related to February 12, 2025 Hearing</i> by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP (Attachments: # 1 Exhibit A, # 2 Exhibit B

		# 3 Exhibit C, # 4 Exhibit D – Proposed Order)(Edelman, Christopher) (Entered: 02/12/2025)
02/12/2025	<u>16</u>	NOTICE of Proposed Order by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC. re 13 MOTION for Temporary Restraining Order, Motion Hearing, (Attachments: # 1 Text of Proposed Order)(Sansone, Nicolas) (Entered: 02/12/2025)
02/13/2025	<u>17</u>	ORDER granting in part and denying in part Plaintiffs' <u>13</u> motion for a temporary restraining order. See document for details. Signed by Judge Amir H. Ali on 2/13/2025. (lcaha2) (Entered: 02/13/2025)
02/14/2025	<u>18</u>	TRANSCRIPT OF STATUS CONFERENCE – MOTIONS – TEMPORARY RESTRAINING ORDER VIA ZOOM TELECONFERENCE PROCEEDINGS before Judge Amir H. Ali held on February 12, 2025; Page Numbers: 1–74. Court Reporter/Transcriber: William Zaremba; Email: William_Zaremba@dcd.uscourts.gov. Transcripts may be ordered by submitting the <u>Transcript Order Form</u>
		For the first 90 days after this filing date, the transcript may be viewed at the courthouse at a public terminal or purchased from the court reporter referenced above. After 90 days, the transcript may be accessed via PACER. Other transcript formats, (multi–page, condensed, PDF or ASCII) may be purchased from the court reporter.
		NOTICE RE REDACTION OF TRANSCRIPTS: The parties have twenty—one days to file with the court and the court reporter any request to redact personal identifiers from this transcript. If no such requests are filed, the transcript will be made available to the public via PACER without redaction after 90 days. The policy, which includes the five personal identifiers specifically covered, is located on our website at www.dcd.uscourts.gov.
		Redaction Request due 3/7/2025. Redacted Transcript Deadline set for 3/17/2025. Release of Transcript Restriction set for 5/15/2025.(Zaremba, William) (Entered: 02/14/2025)
02/14/2025	<u>19</u>	Joint STATUS REPORT by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Bateman, Lauren) (Entered: 02/14/2025)
02/14/2025		MINUTE ORDER. The Court is in receipt of the parties' 19 joint status report proposing a briefing schedule. Defendants shall respond to Plaintiffs' 13 motion for preliminary relief by February 21, 2025. Plaintiffs shall reply by 12:00 p.m. on February 27, 2025. Signed by Judge Amir H. Ali on 2/14/2025. (lcaha2) (Entered: 02/14/2025)
02/16/2025	<u>20</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 2/11/2025. Answer due for ALL FEDERAL DEFENDANTS by 4/12/2025. (Attachments: # 1 Exhibit Acceptance of Summons)(Bateman, Lauren) (Entered: 02/16/2025)
02/18/2025	<u>21</u>	NOTICE of Appearance by Indraneel Sur on behalf of All Defendants (Sur, Indraneel) (Entered: 02/18/2025)
02/18/2025	22	STATUS REPORT regarding Compliance by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. (Attachments: # 1 Exhibit USAID & State Decl, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit OMB Decl)(Sur, Indraneel) (Entered: 02/18/2025)
02/19/2025	<u>23</u>	Unopposed MOTION for Leave to File <i>Amicus Curiae Brief</i> by CONSTITUTIONAL ACCOUNTABILITY CENTER. (Attachments: # 1 Exhibit Proposed Amicus Brief, # 2 Text of Proposed Order)(Gorod, Brianne) (Entered: 02/19/2025)
02/19/2025	<u>24</u>	NOTICE of Appearance by Brianne Jenna Gorod on behalf of CONSTITUTIONAL ACCOUNTABILITY CENTER (Gorod, Brianne) (Entered: 02/19/2025)

02/19/2025	<u>25</u>	NOTICE of Appearance by Miriam Becker–Cohen on behalf of CONSTITUTIONAL ACCOUNTABILITY CENTER (Becker–Cohen, Miriam) (Entered: 02/19/2025)
02/19/2025	<u>26</u>	Emergency MOTION for Contempt by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Attachments: # 1 Exhibit Third Declaration of Mitchell Warren, # 2 Exhibit Third Declaration of Andrew Sullivan, # 3 Exhibit Declaration of Jessica Doe, # 4 Text of Proposed Order Proposed Order)(Bateman, Lauren) (Entered: 02/19/2025)
02/19/2025		MINUTE ORDER. Defendants are directed to respond to Plaintiffs' <u>26</u> emergency motion for contempt by 1:00 p.m. on February 20, 2025. Signed by Judge Amir H. Ali on 2/19/2025. (Icaha2) (Entered: 02/19/2025)
02/20/2025	<u>27</u>	ERRATA <i>to ECF 26</i> by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Bateman, Lauren) (Entered: 02/20/2025)
02/20/2025	<u>28</u>	RESPONSE re <u>26</u> Emergency MOTION for Contempt filed by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. (Sur, Indraneel) (Entered: 02/20/2025)
02/20/2025	<u>29</u>	REPLY to opposition to motion re <u>26</u> Motion for Contempt, filed by AIDS VACCINE ADVOCACY COALITION, JOURNALISM DEVELOPMENT NETWORK, INC (Bateman, Lauren) (Entered: 02/20/2025)
02/20/2025	<u>30</u>	ORDER. Plaintiffs' <u>26</u> motion for contempt and to enforce the Court's temporary restraining order is granted in part and denied in part. See document for details. Signed by Judge Amir H. Ali on 2/20/2025. (lcaha2) (Entered: 02/20/2025)
02/21/2025		MINUTE ORDER. The parties in this case and No. 25–cv–00402 shall meet and confer and file a consolidated joint status report by February 26, 2025, at 12:00 p.m., addressing Defendants' "prompt compliance with the order." Defendants' Br., ECF No. 28 at 8. Signed by Judge Amir H. Ali on 2/21/2025. (lcaha2) (Entered: 02/21/2025)
02/21/2025	<u>31</u>	STANDING ORDER. The parties are ordered to comply with the directives set forth in the attached standing order. See document for details. Signed by Judge Amir H. Ali on 2/21/2025. (lcaha2) (Entered: 02/21/2025)
02/21/2025	<u>32</u>	MOTION to Clarify re <u>30</u> Order on Motion for Contempt, <u>17</u> Order on Motion for TRO, Set/Reset Deadlines, MOTION to Stay by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. (Sur, Indraneel) (Entered: 02/21/2025)
02/21/2025	<u>33</u>	Memorandum in opposition to re 13 Motion for TRO, combined with opposition in No.402 filed by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. (Sur, Indraneel) (Entered: 02/21/2025)
02/22/2025	<u>34</u>	ORDER. To the extent Defendants' <u>32</u> motion to clarify is not mooted by the discussion herein, it is denied, and Defendants' motion to stay the Court's TRO pending an emergency appeal is also denied. See document for details. Signed by Judge Amir H. Ali on 2/22/2025. (lcaha3) (Entered: 02/22/2025)
02/24/2025		MINUTE ORDER. The Court is in receipt of the emergency motion to enforce filed in No. 25–cv–00402. The Court will hold a telephonic status hearing on February 25, 2025, at 11:00 a.m. The information for the public access line is as follows: the toll–free number is 833–990–9400, and the Meeting ID is 771021014. Signed by Judge Amir H. Ali on 2/24/2025. (lcaha1) Modified on 2/25/2025. (zalh) (Entered: 02/24/2025)
02/25/2025		Set/Reset Hearings: Status Conference set for 2/25/2025 at 11:00 AM via teleconference before Judge Amir H. Ali. (zalh) (Entered: 02/25/2025)
02/25/2025	<u>35</u>	TRANSCRIPT OF MOTION HEARING before Judge Amir H. Ali held on February 25, 2025; Page Numbers: 1–60. Date of Issuance: 2/25/2025. Court Reporter: Bryan A. Wayne. Transcripts may be ordered by submitting the <u>Transcript Order Form</u>

		For the first 90 days after this filing date, the transcript may be viewed at the courthouse at a public terminal or purchased from the court reporter referenced above. After 90 days, the transcript may be accessed via PACER. Other transcript formats, (multi–page, condensed, CD or ASCII) may be purchased from the court reporter.  NOTICE RE REDACTION OF TRANSCRIPTS: The parties have twenty—one days to file with the court and the court reporter any request to redact personal identifiers from this transcript. If no such requests are filed, the transcript will be made available to the public via PACER without redaction after 90 days. The policy, which includes the five personal identifiers specifically covered, is located on our website at www.dcd.uscourts.gov.  Redaction Request due 3/18/2025. Redacted Transcript Deadline set for 3/28/2025. Release of Transcript Restriction set for 5/26/2025. (Wayne, Bryan) (Main Document
02/25/2025		Minute Entry and Order for Proceedings held before Judge Amir H. Ali: Status Conference held via Zoom on 2/25/2025. Oral motion by the Plaintiff for "Emergency MOTION to Enforce Temporary Restraining Order", HEARD and GRANTED for the reasons stated on the record after oral argument. The restrained defendants are ORDERED to comply as discussed by 11:59 p.m. on February 26, 2025. (Court Reporter Bryan Wayne) (znbn) (Entered: 02/25/2025)
02/25/2025	<u>36</u>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to Status Conference, by UNITED STATES DEPARTMENT OF STATE, UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, MARCO RUBIO, OFFICE OF MANAGEMENT & BUDGET, RUSSELL VOUGHT, DONALD TRUMP. Fee Status: No Fee Paid. Parties have been notified. (Sur, Indraneel) (Entered: 02/25/2025)

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AIDS VACCINE ADVOCACY COALITION, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF STATE, et al.,

Defendants.

GLOBAL HEALTH COUNCIL, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Civil Action No. 25-00400 (AHA)

Civil Action No. 25-00402 (AHA)

## **DEFENDANTS' NOTICE OF APPEAL**

All Defendants hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from this Court's Minute Entry and Order for proceedings held on February 25, 2025 and the oral relief granted (not assigned ECF No.).

Dated: February 25, 2025 Respectfully submitted,

ERIC J. HAMILTON
Deputy Assistant Attorney General

ALEXANDER K. HAAS Director

LAUREN A. WETZLER Deputy Director

CHRISTOPHER R. HALL Assistant Branch Director

/s/ Indraneel Sur

INDRANEEL SUR (D.C. Bar 978017)
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